

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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CHRISTOPHER PAGAN, on behalf of himself  
and all others similarly situated,

Docket No.:  
24-cv-00104

Plaintiffs,

-against-

**NOTICE OF MOTION**

LUCCELLO, INC., d/b/a Itshot.com,

Defendants.  
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**PLEASE TAKE NOTICE** that, pursuant to Fed. R. Civ. P. 55(a) and Local Civil Rule 55.2, and upon the accompanying Memorandum of Law submitted in support thereof, and all of the prior pleadings, proceedings and papers heretofore had herein, Plaintiff Christopher Pagan, on behalf of himself, will move this Court at the United States Courthouse, Southern District of New York, 40 Foley Square, New York, New York, 10007, on 20th day of March, 2024 , for an Order granting Plaintiff's default judgment against Defendant Luccello, Inc., d/b/a Itshot.com ("Defendant"), based on Defendant's failure to appear or otherwise answer within the deadlines required by Fed. R. Civ. P. 12, and for such other and further relief as the Court may deem just and proper.

A copy of the Clerk's Certificate of Default, a copy of the Complaint, and a proposed Order granting Default are annexed hereto.

Dated: New York, New York  
March 6, 2024

Respectfully Submitted,

**JON L. NORINSBERG, ESQ., PLLC**



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